UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

RASUL MUHAMMAD, on behalf of)	
himself and all others similarly situated,)	
Plaintiff,)	
v.)	Case No.: 1:19-cv-07745
HUMBLE FASHION, LLC,)	Judge John Kness
Defendant.)	
)	
)	

NOTICE OF SETTLEMENT AND MOTION TO STAY BRIEFING

Plaintiff Rasul Muhammad ("Plaintiff") and Defendant Humble Fashion LLC ("Defendant") (collectively the "Parties"), by and through their undersigned attorneys, hereby submit the following in support of their Notice of Settlement and Motion to Stay Briefing:

- 1. On November 23, 2019, Plaintiff filed his Class Action Complaint against Defendant in this Court. *See* Dkt. No. 1.
- 2. On July 6, 2020, Defendant moved to dismiss the Complaint, strike the class allegations and strike certain forms of relief. *See* Dkt. Nos. 30-31.
- 3. On July 10, 2020, this Court ordered that Plaintiff shall respond to Defendant's Motion by August 7, 2020, and Defendant shall reply by August 21, 2020. *See* Dkt. No. 33.
- 4. The Parties have reached a settlement and are in the process of preparing the settlement documents.
- 5. The Parties anticipate that they will finalize the settlement documents and file a stipulation of dismissal within the next 60 days.

- 6. In light of the foregoing, the Parties request that the Court stay briefing on Defendant's Motion to Dismiss while the Parties finalize the settlement.
 - 7. This request is made in good faith and not for purposes of delay.

WHEREFORE, Plaintiff Rasul Muhammad and Defendant Humble Fashion LLC respectfully request that their motion be granted, and for any further or other relief as this Court deems just and proper.

Dated: August 6, 2020 Respectfully submitted,

/s/ Joe Kramer

One of the Attorneys for Plaintiff Rasul Muhammad

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/s/ Katherine Oblak

One of the Attorneys for Defendant Humble Fashion, LLC

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on August 6, 2020, she caused a true and correct

copy of the foregoing document to be filed with the Court by electronic filing protocols, and that

same will therefore be electronically served upon all attorneys of record registered with the Court's

ECF/CM system.

/s/ Katherine Oblak

Counsel for Defendant

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